

Pro Se 11 2016

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JAN 27 2022

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

BY

DEPUTY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

22-CV-

88 JCC

Tse, B.K.

CASE NO. \_\_\_\_\_  
[to be filled in by Clerk's Office]

THIRD-PARTY COMPLAINT

Jury Trial: ☐ Yes x No

Plaintiff(s),

v.

Chin, Arnold

Lum, Joseph

Shiu, Brainerd

Defendant(s)/Third-

Party Plaintiff(s),

v.

Cascade View Condominiums

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**I. THE PARTIES TO THIS COMPLAINT****A. Plaintiff(s)**

*Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.*

Name	Tse, B.K.
Street Address	808 Fir St., Unit 503
City and County	Seattle, King County
State and Zip Code	WA 98104-5151
Telephone Number	(253) 259-4761

**B. Defendant(s)/Third-Party Plaintiff(s)**

*Provide the information below for each defendant/third-party plaintiff named in the complaint. Attach additional pages if needed.*

Name	Cascade View Condominiums
Street Address	206 25 <sup>th</sup> Ave. E.
City and County	Seattle, King County
State and Zip Code	WA 98112
Telephone Number	Demco Law (206) 232-6000

**C. Third-Party Defendant(s)**

*Provide the information below for each third-party defendant named in the complaint, whether the third-party defendant is an individual, a government agency, an organization, or a corporation. For an individual third-party defendant, include the person's job or title (if known). Attach additional pages if needed.*

**Third-Party Defendant No. 1**

Name	Chin, Arnold
Job or Title (if known)	Engineer
Street Address	6516 8 <sup>th</sup> S.E.
City and County	Mercer Island, King County
State and Zip Code	WA 98040

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1 Telephone Number (206) 232-4947

2 Third-Party Defendant No. 2

3 Name Lum, Joseph

4 Job or Title (*if known*) Priest

5 Street Address 205 Mountain Peak Blvd. S.W.

6 City and County Issaquah, King County

7 State and Zip Code WA 98027

8 Telephone Number (425)587-1232

9 Third-Party Defendant No. 3

10 Name Shiu, Brainerd

11 Job or Title (*if known*) Priest

12 Street Address 2803 S. Orcas St.

13 City and County Seattle, King County

14 State and Zip Code WA 98108

15 Telephone Number (206) 725-0771

16 Third-Party Defendant No. 4

17 Name Wan, G.K.

18 Job or Title (*if known*) Interpreter

19 Street Address 1600 Seventh Ave., 14<sup>th</sup> Fl.

20 City and County Seattle, King County

21 State and Zip Code WA 98101

22 Telephone Number (206) 725-0771

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**II. INITIAL COMPLAINT**

- 1
- 2 A. *Identify the initial complaint filed against you and the date it was filed. Describe the*  
 3 *events that gave rise to the plaintiff's complaint, the nature of the claims asserted, and the*  
 4 *relief sought. Attach the complaint as an exhibit.*

5 KCSC 07-28663-2sea: 1) condominium flooring bylaw dispute 2) dispute over payment  
 6 for maintenance materials unauthorized subseq deducted from homeowners dues  
 7 \_\_\_\_\_

- 8 B. *State whether you have filed an answer to the complaint and, if so, briefly summarize*  
 9 *what admissions or denials that answer asserted. Attach the answer as an exhibit.*

10 Answered through court appointed Guardian by proceeds from sale of condominium  
 11 unit Interest rate calculations subj to review. Condominium sold at one half market  
 12 value due to damages incurred by unauthorized Third-Party Defendant of fraudulent  
 13 security clearance.

**III. THIRD-PARTY COMPLAINT**

- 14
- 15 A. *Describe the nature of the relationship between you and the third-party defendant.*  
 16 *Attach any contracts or documents showing the nature of the relationship.*

17 1. Church affiliation, 2. security clearance application reference once terminated and  
 18 debriefed, 3. plaintiff to city code compliance violation.  
 19 \_\_\_\_\_

- 20 B. *Explain why, if the plaintiff received any judgment against you, you will be entitled to*  
 21 *judgment against the third-party defendant for contribution to or indemnification for the*  
 22 *amount of damages and costs awarded to the plaintiff. Include the percentage of the*  
 23 *plaintiff's recovery that the third-party defendant will be required to contribute.*  
 24 *Describe the facts, or relevant provisions of state law, that demonstrate you are entitled*  
 25 *to collect from the third-party defendant.*

Illegal entry and property damage subsequent; third-party defendant 100%.

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Fifth place of residence under surveillance and invasion.

#### IV. CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 1/25/22

Signature of Defendant/3<sup>rd</sup> Party BK J

Printed Name Defendant/3<sup>rd</sup> Party TSE, B.K.

Date of signing: \_\_\_\_\_

Signature of Defendant/3<sup>rd</sup> Party \_\_\_\_\_

Printed Name Defendant/3<sup>rd</sup> Party \_\_\_\_\_



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808 Fir St., Unit 503  
Seattle, WA 98104-5151

U.S. District Court  
Western Division  
Attn: Court Clerk  
Subj: Case Assignment  
700 Stewart St.  
Seattle, WA 98101-1271

U.S. POSTAGE PAID  
SEATTLE, WA  
98104  
JAN 25, 22  
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